

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

Prosecution Request
for Leave until 28 November 2012
to File Government Motion to Compel

14 November 2012

1. The United States requests leave of the Court until 28 November 2012 to file any Government Motion to Compel Discovery. The current deadline for the Government Motion to Compel Discovery (if any) is 16 November 2012. See AE 385. The deadline for the defense to disclose reciprocal discovery was 15 October 2012. See AE 286. The defense disclosed 24,544 pages of reciprocal discovery on 15 October 2012 and an additional 197 pages on 30 October 2012. See Enclosure.
2. The United States is in the process of completing a review of the almost 25,000 pages of reciprocal discovery, however, requests an additional two weeks to complete its review given the volume of the disclosure. Currently, the United States does not anticipate needing to file a Motion to Compel, however, would like the opportunity to complete a thorough review of the reciprocal discovery before making the final determination.
3. To maintain the current litigation schedule, the United States proposes a filing deadline of 28 November 2012 and a response deadline of 5 December 2012. The United States will not file a reply.
4. This request will not necessitate a delay in the proceedings and, if the Court approves the adjusted calendar deadlines, will not necessitate a delay in any potential litigation regarding the reciprocal discovery. There will be no prejudice to the defense.



ANGEL M. OVERGAARD
CPT, JA
Assistant Trial Counsel

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel via electronic mail, on 14 November 2012.



ANGEL M. OVERGAARD
CPT, JA
Assistant Trial Counsel

Encl
3 Defense Emails, dated 14 and 30 October 2012

UNITED STATES OF AMERICA

v.

**Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211**

**Prosecution Request
for Leave until 28 November 2012
to File Government Motion to Compel**

Enclosure

14 November 2012

From: David Coombs
To: (b) (6)
Cc: [REDACTED]
Subject: Defense Reciprocal Discovery
Date: Sunday, October 14, 2012 5:13:47 PM

(b) (6)

Today the Defense sent to OSJA-MDW via FEDEX (Tracking # 8010 9805 3321) the following reciprocal discovery: (BATES # 000001-024544).

These documents are those that are responsive to the Government's discovery request filed on 24 March 2012. The Defense understands that under RCM 701(d) the Government's reciprocal discovery request is a continuing request. Should the Defense identify additional reciprocal discovery, we will either immediately provide the identified information through BATES numbered discovery or coordinate a mutually convenient time for inspection by the Government, prior to trial, at the Fort Meade Trail Defense Service Office.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs

(b) (6)

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From: David Coombs
To: (b) (6)
Cc: [REDACTED]
Subject: Additional Defense Reciprocal Discovery
Date: Tuesday, October 30, 2012 10:25:44 AM
Attachments: 024545-024616.pdf

(b) (6)

I hope you successfully weathered the storm. I will be sending two separate emails with additional defense reciprocal discovery. Let me know if you have any questions.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs

(b) (6)
[REDACTED]

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From: David Coombs
To: (b) (6)
Cc: [REDACTED]
Subject: Additional Defense Reciprocal Discovery
Date: Tuesday, October 30, 2012 10:28:07 AM
Attachments: [024617-024618.pdf](#)
[024619-024638.pdf](#)
[024639-024719.pdf](#)
[024720-024729.pdf](#)
[024721-024735.pdf](#)
[024736-024741.pdf](#)

(b) (6)

Here is the second email of additional reciprocal discovery.

Best,
David

David E. Coombs, Esq.
Law Office of David E. Coombs

(b) (6)
(b) (6)
[REDACTED]

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